

Exhibit D

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

VALERIE W. WAKEFIELD,
Plaintiff,
v.
JOY MINING MACHINERY
COMPANY, a division of Haxnischfeger
Industries,
Defendant.

) CIVIL DMSION
)
) Civil Action No. 05 CV 79 - Erie)
) Honorable Maurice B. Cohill, Jr.
)
)
) JURY TRIAL DEMANDED)
)
) .

COM:MONWEALTH OF PENNSYLVANIA

ss

COUNTY OF VENANOO"

AFFIDAVIT OF DANIEL BLAUSER

The undersigned, Daniel Blauser, being sworn, deposes and states as follows based on personal knowledge:

1. My name is Daniel Blauser.
 2. I have been employed by Joy Mining for 31 years and have held the following positions: draftsman, engineering change technician, specifications engineer, manager product services and demand manager.
 3. I know Jill Seyler.
 4. I knew MIS. Seyler's late husband
 5. I knew Mr. Seyler because we worked together at Joy for approximately 20 years and were friends.
 6. Mr. Seyler passed away in September of 1998.

7. Following Mr Seyler's death, I was instrumental in Mrs. Seyler coming to work at Joy.

8. From February of 2000 to March of 2003, Mrs. Seyler worked for me as a secretary. I was her direct supervisor.

9. I felt personally responsible for Mrs. Seyler's well-being, based on my personal friendship and business relationship with her late husband.

10. Mrs. Seyler's work station was located close to my office.

11. I know Larry Meade.

12. I never overheard Mr. Meade say anything to Mrs Seyler that either she or I viewed as objectionable in any way.

13 Mrs. Seyler never brought to my attention that she was uncomfortable with Mr. Meade.

14. I am familiar with Joy's harassment policy,

15. Given my personal relationship with Mr. Seyler and my personal concern for Mrs. Seyler's well-being, had she brought any concerns to my attention, or had I personally observed any inappropriate behavior on Mr. Meade's part, I would have taken steps to enforce Joy's harassment policy.

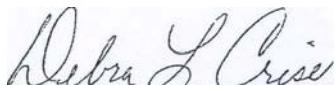


DANIEL BLAUSER

Signed to and subscribed before me this

/SB.day of /J!J-f«!Jj, 2007.

Notary Public



COMMONWEALTH OF PENNSYLVANIA
Notarial Seal Debra L. Crise, Notary Public City

Of Franklin, Venango County My Commission

Expires June 28, 2007 Member, Pennsylvania

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